UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JOSE SANTANA,)
Plaintiff,))) Case No: 06 CV 01775
VS.) Judge James B. Zagel)
LIEUTENANT CODY #105, et al.,)))
Defendants))

POST-TRIAL MOTION

NOW COME the defendants, Jason Keeling and Harold Grimes, by and through their attorneys, LITCHFIELD CAVO, LLP, and pursuant to Rules 50(a) and 50(b) move for judgment as a matter of law or judgment notwithstanding the verdict. Alternatively, the defendants request that this court grant defendants a new trial, or alter or amend the judgment against defendants pursuant to FRCP 59(a) and (e). In support of their motion, the defendants submit their Memorandum of Law.

WHEREFORE, for the reasons set forth in the defendants' Memorandum of Law, submitted herewith, the defendants request that this court enter an order granting them judgment as a matter of law. Alternatively, defendants are entitled to a new trial, or to have the judgment altered or amended, because the evidence adduced at trial did not support the verdict against the defendants, plaintiff's inflammatory remarks deprived defendants of a fair trial, flawed jury

instructions prejudiced defendants and the evidence introduced at trial does not justify the jury's assessment of compensatory damages.

LITCHFIELD CAVO, LLP.

By: /s/ Patrick J. Ruberry

Attorneys for the defendants, Jason Keeling and Harold Grimes

Patrick J. Ruberry, Esq. (06188844) LITCHFIELD CAVO, LLP 303 West Madison Street, Suite 300 Chicago, IL 60606-3300 (312) 781-6677 (312) 781-6630 fax **CERTIFICATE OF SERVICE**

I, the undersigned, being first duly sworn upon oath, depose, and say that I caused to be

served the foregoing Post-Trial Motion by electronically filing the same with the Clerk for the

U.S. District Court for the Northern District of Illinois, Eastern Division, a copy of which was

then forwarded to each attorney of record by CM/ECF on the 25th day of February, 2011.

/s/ Patrick J. Ruberry

Attorneys for the defendants, Jason Keeling and Harold Grimes

Patrick J. Ruberry, Esq. (06188844) LITCHFIELD CAVO, LLP 303 West Madison Street, Suite 300 Chicago, IL 60606-3300 (312) 781-6677 (312) 781-6630 fax

3